



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GRETHUR
DIRECTOR

September 23, 2016

Mr. Douglas Ballotti, Acting Director
Superfund Division
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (S-6J)
Chicago, Illinois 60604-3507

Dear Mr. Ballotti:

SUBJECT: Ten Mile Drain Superfund Site
St. Clair Shores, St. Clair County, Michigan
Explanation of Significant Differences

Staff of the Michigan Department of Environmental Quality (MDEQ) has reviewed the Explanation of Significant Differences (ESD) for the Ten Mile Drain (TMD) Superfund Site. This ESD was submitted to document significant differences in certain components of the second selected interim remedy for the TMD Superfund Site. The second selected interim remedy for the site was set forth in the Record of Decision (ROD) signed on May 16, 2014.

The 2014 Interim ROD selected the removal and replacement of two vaulted manhole structures in the TMD storm sewer system along with polychlorinated biphenyl (PCB) contaminated bedding and backfill materials. Based on the ESD, the interim action was expanded when, during the excavation of one of the manhole structures, oil containing PCBs was observed. Because of these conditions, the implemented remedy included the removal and replacement of 120 feet of storm sewer along with the bedding materials, the use of an alternate manhole vault lining method, the installation of two anti-seep collars, a reduction in the number of extraction and monitoring wells, and the use of an on-site carbon filtration system.

The MDEQ concurs with the remedy modification of the Interim ROD as described in the ESD.

The MDEQ appreciates the opportunity to provide input on this ESD. If you have any questions or concerns, please contact Ms. Jessica Ferris at 517-284-5130; ferrisj6@michigan.gov; MDEQ, Remediation and Redevelopment Division, P.O. Box 30426, Lansing, Michigan 48909-7926; or you may contact me.

Sincerely,

David Kline, Chief
Superfund Section
Remediation and Redevelopment Division
517-284-5121

cc: Ms. Joan Tanaka, United States Environmental Protection Agency (USEPA)
Ms. Rebecca Frey, USEPA
Ms. Colleen Moynihan, USEPA
Ms. Susan Leeming, MDEQ
Mr. Robert Franks, MDEQ
Ms. Jessica Ferris, MDEQ